

**CALIFORNIA CIVIL RIGHTS LAW GROUP**

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Attorneys for Plaintiffs,  
DEMETRIC DI-AZ and OWEN DIAZ

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

DEMETRIC DI-AZ, OWEN DIAZ, and  
LAMAR PATTERSON,

Plaintiffs,

v.

TESLA, INC. dba TESLA MOTORS, INC.;  
CITISTAFF SOLUTIONS, INC.; WEST  
VALLEY STAFFING GROUP;  
CHARTWELL STAFFING SERVICES, INC.;  
and DOES 1-50, inclusive,

Defendants.

Case No. 3:17-cv-06748-WHO

**SUPPLEMENTAL DECLARATION OF  
LAWRENCE ORGAN IN SUPPORT OF  
PLAINTIFFS' OPPOSITION TO  
DEFENDANT CITISTAFF SOLUTIONS,  
INC.'S MOTION FOR SUMMARY  
JUDGEMENT, OR IN THE  
ALTERNATIVE FOR SUMMARY  
ADJUDICATION OF ISSUES**

Date: October 23, 2019

Time: 2:00 p.m.

Courtroom: 2, 17th Floor

Judge: Hon. William H. Orrick

Trial Date: March 2, 2020

Complaint filed: October 16, 201

1 I, LAWRENCE ORGAN, hereby declare:

2 1. I am an attorney licensed to practice law in the State of California. I am an  
3 attorney with the law firm of California Civil Rights Law Group, attorneys of record for  
4 Plaintiffs Demetric Di-Az and Owen Diaz in this action. I submit this Supplemental Declaration  
5 in support of Plaintiffs' Opposition to Defendant's Motion for Summary Judgment. I have  
6 personal knowledge of the facts stated herein and if called upon to testify, I could and would  
7 competently testify thereto, except as to those matters that are stated upon information and belief.  
8

9 2. Exhibit A, filed under seal, consists of true and correct copies of documents  
10 produced by Defendant Citistaff Solutions, Inc. in discovery and Bates-stamped CITISTAFF-  
11 000034 to CITISTAFF-000035. Defendant marked this document as "confidential" pursuant to  
12 the Protective Order, and the document should therefore be sealed pursuant to this Order.  
13

14 3. Exhibit B, filed under seal, is a true and correct copy of a document produced by  
15 Defendant Citistaff Solutions, Inc. in discovery and Bates-stamped CITISTAFF-000043.  
16 Defendant marked this document as "confidential" pursuant to the Protective Order, and the  
17 document should therefore be sealed pursuant to this Order.  
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19 4. Exhibit C, filed under seal, is a true and correct copy of a document produced by  
20 Defendant Nextsource, Inc. in discovery and Bates-stamped NS000004. Defendant marked this  
21 document as "confidential" pursuant to the Protective Order, and the document should therefore  
22 be sealed pursuant to this Order.  
23

24 5. Exhibit D, filed under seal, consists of a true and correct copy of various experts  
25 from the deposition of Owen Diaz. Defendant marked this document as "confidential" pursuant  
26 to the Protective Order, and the document should therefore be sealed pursuant to this Order.  
27

28 6. Exhibit E, filed under seal, is a true and correct copy of a document produced by  
Defendant Tesla, Inc. in discovery and Bates-stamped TESLA-0000511. Defendant marked this

1 document as "confidential" pursuant to the Protective Order, and the document should therefore  
2 be sealed pursuant to this Order.

3 7. Exhibit F, filed under seal, is a true and correct copy of a document produced by  
4 Defendant Tesla, Inc. in discovery and Bates-stamped TESLA-0000510. Defendant marked this  
5 document as "confidential" pursuant to the Protective Order, and the document should therefore  
6 be sealed pursuant to this Order.  
7

8 8. Exhibit G, filed under seal, consists of true and correct copies of documents  
9 produced by Defendant Tesla, Inc. in discovery and Bates-stamped TESLA-0000667 to TESLA-  
10 0000671. Defendant marked this document as "confidential" pursuant to the Protective Order,  
11 and the document should therefore be sealed pursuant to this Order.  
12

13 9. Exhibit H, filed under seal, consists of true and correct copies of documents  
14 produced by Defendant Tesla, Inc. in discovery and Bates-stamped TESLA-0000314 to TESLA-  
15 0000316. Defendant marked this document as "confidential" pursuant to the Protective Order,  
16 and the document should therefore be sealed pursuant to this Order.  
17

18 10. Exhibit I, filed under seal, is a true and correct copy of various excerpts from the  
19 deposition of Demetric Di-Az. Defendant marked this document as "confidential" pursuant to the  
20 Protective Order, and the document should therefore be sealed pursuant to this Order.

21 11. Exhibit J, filed under seal, is a true and correct copy of various excerpts from the  
22 deposition of Lamar Patterson. Defendant marked this document as "confidential" pursuant to  
23 the Protective Order, and the document should therefore be sealed pursuant to this Order.  
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25 12. Exhibit K, filed under seal, is a true and correct copy of a document produced by  
26 Defendant Tesla, Inc. in discovery and Bates-stamped TESLA-000060. Defendant marked this  
27 document as "confidential" pursuant to the Protective Order, and the document should therefore  
28 be sealed pursuant to this Order.

1           13.     Exhibit L, filed under seal, is a true and correct copy of a document produced by  
2 Defendant Tesla, Inc. in discovery and Bates-stamped TESLA-0000626. Defendant marked this  
3 document as "confidential" pursuant to the Protective Order, and the document should therefore  
4 be sealed pursuant to this Order.

5           14.     Exhibit M, filed under seal, consists of true and correct copies of documents  
6 produced by Defendant nextSource, Inc. in discovery and Bates-stamped NS000138 through  
7 NS000139. Defendant marked this document as "confidential" pursuant to the Protective Order,  
8 and the document should therefore be sealed pursuant to this Order.

9           15.     Exhibit N, filed under seal, consists of true and correct copies of documents  
10 produced by Defendant Citistaff Solutions, Inc. in discovery and Bates-stamped CITISTAFF-  
11 0000050 through CITISTAFF-0000055. Defendant marked this document as "confidential"  
12 pursuant to the Protective Order, and the document should therefore be sealed pursuant to this  
13 Order.

14           16.     Exhibit O, filed under seal, consists of true and correct copies of documents  
15 produced by Defendant Citistaff Solutions, Inc. in discovery and Bates-stamped CITISTAFF-  
16 0000004 through CITISTAFF-0000005. Defendant marked this document as "confidential"  
17 pursuant to the Protective Order, and the document should therefore be sealed pursuant to this  
18 Order.

19           17.     Exhibit P, filed under seal, consists of true and correct copies of documents  
20 produced by Defendant nextSource, Inc. in discovery and Bates-stamped NS000038 –  
21 NS000045. Defendant marked this document as "confidential" pursuant to the Protective Order,  
22 and the document should therefore be sealed pursuant to this Order.

23           18.     Exhibit Q, filed under seal, consists of true and correct copies of documents  
24 produced by Defendant nextSource, Inc. in discovery and Bates-stamped NS000095 through  
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1 NS000100. Defendant marked this document as "confidential" pursuant to the Protective Order,  
2 and the document should therefore be sealed pursuant to this Order.

3 19. Exhibit R, filed under seal, is a true and correct copy of a document produced by  
4 Defendant nextSource, Inc. in discovery and Bates-stamped NS000014. Defendant marked this  
5 document as "confidential" pursuant to the Protective Order, and the document should therefore  
6 be sealed pursuant to this Order.  
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8 20. Exhibit S, filed under seal, consists of true and correct copies of documents  
9 produced by Defendant Citistaff Solutions, Inc. in discovery and Bates-stamped CITISTAFF-  
10 0000009 through CITISTAFF-0000010. Defendant marked this document as "confidential"  
11 pursuant to the Protective Order, and the document should therefore be sealed pursuant to this  
12 Order.  
13

14 21. Exhibit T, filed under seal, consists of true and correct copies of documents  
15 produced by Defendant Tesla, Inc. in discovery and Bates-stamped TESLA-0000321 through  
16 TESLA-0000323. Defendant marked this document as "confidential" pursuant to the Protective  
17 Order, and the document should therefore be sealed pursuant to this Order.  
18

19 22. Exhibit U, filed under seal, consists of true and correct copies of documents  
20 produced by Defendant Citistaff Solutions, Inc. in discovery and Bates-stamped TESLA-  
21 0000001 through TESLA-0000003. Defendant marked this document as "confidential" pursuant  
22 to the Protective Order, and the document should therefore be sealed pursuant to this Order.  
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24 23. Exhibit V, filed under seal, consists of true and correct copies of documents  
25 produced by Defendant nextSource, Inc. in discovery and Bates-stamped NS000175 through  
26 NS000178. Defendant marked this document as "confidential" pursuant to the Protective Order,  
27 and the document should therefore be sealed pursuant to this Order.  
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1 I declare under penalty of perjury under the laws of the United States of America that the  
2 foregoing is true and correct. Executed on October 2, 2019 in San Anselmo, California.  
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4  
5 DATED: October 2, 2019

By: /s Lawrence Organ  
Lawrence A. Organ, Esq.  
Navruz Avloni, Esq.  
Attorneys for Plaintiffs  
DEMETRIC DI-AZ AND OWEN DIAZ  
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